

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

ETHICON ELECTION WAVE (PTO 298)
CASES LISTED IN EXHIBIT A TO
PLAINTIFFS' NOTICE OF ADOPTION
(Doc. 7276)

JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE

**ETHICON DEFENDANTS' NOTICE OF ADOPTION OF PRIOR DAUBERT
RESPONSE OF JULIE DROLET, M.D. FOR ELECTION WAVE (PTO) CASES**

Plaintiffs filed a Notice of Adoption as to the opinion testimony of Julie Drolet, M.D., in the Election Wave (PTO 298) cases identified in Exhibit A to their Notice. *See* Doc. 7276. Defendants adopt and incorporate by reference the *Daubert* response filed as to Julie Drolet, M.D. for Ethicon Wave 4 (Doc. 3789). Defendants respectfully request that the Court deny Plaintiffs' motion for the reasons expressed in the Wave 4 response briefing.

Respectfully submitted,

/s/ William M. Gage
William M. Gage (MS Bar No. 8691)
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4561
[william.gage@butlersnow.com](mailto:wiliam.gage@butlersnow.com)

/s/ Susan M. Robinson
Susan M. Robinson (W. Va. Bar No. 5169)
Thomas Combs & Spann PLLC
300 Summers Street
Suite 1380 (25301)
P.O. Box 3824
Charleston, WV 24338
(304) 414-1800

srobinson@tcspllc.com

Counsel for Defendants Ethicon, Inc.,
and Johnson & Johnson

CERTIFICATE OF SERVICE

I certify that on this day, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

William M. Gage